

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RHONDA STEEN,

Plaintiff,

v.

LIFE INSURANCE COMPANY OF NORTH
AMERICA, THE UNITED STATES LIFE
INSURANCE COMPANY IN THE CITY OF
NEW YORK, and AMERICAN
INTERNATIONAL GROUP, INC. also known
as AIG AMERICAN GENERAL,

Defendants.

Case No. 08 CV 4181

Judge Andersen
Magistrate Judge Ashman

**MOTION OF DEFENDANTS FOR EXTENSION OF TIME TO FILE RESPONSIVE
PLEADING**

Defendants Life Insurance Company of North America, The United States Life Insurance Company in the City of New York, and American International Group, Inc. also known as AIG American General (collectively “Defendants”), by their undersigned counsel, move pursuant to Fed.R.Cvi.P. 6(b) for an enlargement of time to and including September 12, 2008 in which to file their responsive pleadings to Plaintiff’s Complaint, and in support thereof state as follows:

1. Defendants’ responsive pleading to Plaintiff’s Complaint presently is due August 29, 2008. (Doc. #7.)

2. Despite good faith efforts to do so, counsel for Defendants, Jason M. Kuzniar, requires additional time to prepare and file Defendants’ responsive pleadings to the Complaint due to the recent hospitalization of a family member, which caused Mr. Kuzniar to be out of the office several days the week of August 25, 2008.

3. On August 29, 2008, Mr. Kuzniar left a message with counsel for Plaintiff, Donald L. Bertelle, to determine whether Plaintiff has any objection to the relief requested

herein. At the time of filing this Motion, Defendants' counsel had not yet heard back from Plaintiff's counsel and, therefore, Defendants' counsel does not know whether Plaintiff has any objection to this motion or to the relief requested herein

4. In all events, Plaintiff will not be prejudiced by the extension requested.

WHEREFORE, Defendants respectfully requests that the Court grant this Motion, giving Defendants to and including September 12, 2008 to file their responsive pleading to Plaintiff's Complaint, and award to Defendants such other and further relief as the Court deems just and appropriate.

Respectfully submitted,

**Life Insurance Company of North America, The
United States Life Insurance Company in the
City of New York, and American International
Group, Inc. also known as AIG American
General, Defendants**

By: /s/ Jason M. Kuzniar
One of their attorneys

Daniel J. McMahon, Esq.
Jason M. Kuzniar, Esq.
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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on August 29, 2008, the above and foregoing was electronically filed with the Clerk of the Court using the CM/ECF system and that a true and correct copy was served on the following by CM/ECF Electronic Notification:

Donald L. Bertelle, Esq.
(dlbertelle@sbcglobal.net)

/s/ Jason M. Kuzniar
Jason M. Kuzniar